

### REMARKS

Claims 15-18, 20, 21, 25, 26, 31-34, 36, 37, 39-45 and 47-54 are pending in the application. The examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks herein.

#### *Claim Rejections – 35 U.S.C. § 103*

Claims 15-18, 20, 21, 25, 26, 31-34, 36, 37, 39-45, 47-49, 51 and 53 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over “Pockets of Flexibility in Workflow Specification,” to Shazia Sadiq et al. (“Sadiq”) in view of “Security Policy Consistency,” to Ribeiro et al. (“Ribeiro”). This rejection is respectfully traversed.

Each of claims 15, 31 and 41, as previously presented, includes the features of simplifying a specification of the constraints for each constraint based on resolving intra-constraint conflicts for each constraint type to provide a minimal specification for each constraint of the constraint type, simplifying the specification of the constraints being based on a redundancy or a transitivity within the constraint type (the “simplifying” feature). However, and in a genuine effort to advance prosecution of the instant application, Applicants have amended claims 15, 31 and 41. Specifically, each of claims 15, 31 and 41 has been amended to include the feature of removing redundant constraints.

As discussed in further detail below, Sadiq and Ribeiro, taken alone or in combination, fail to disclose or render obvious each and every feature of claims 15, 31 and 41. Furthermore, Ribeiro teaches away from at least the feature of removing redundant constraints.

The Office action admits that Sadiq fails to disclose the simplifying feature (see Office action, p. 5). In an effort to cure the deficient disclosure of Sadiq, the Office action turns to Ribeiro (see Office action, p. 6). As discussed in further detail below, Ribeiro fails to disclose or render obvious at least the simplifying feature.

The simplifying feature includes resolving intra-constraint conflicts for each constraint type. That is, resolving constraint conflicts within a constraint type, singular, as opposed to between constraint types, plural (i.e., inter-constraint conflicts). Accordingly, the simplifying feature is directed to transivities and redundancies within a constraint type (see ¶ [0136], for example, of the patent application publication), and not between constraints or constraint types.

On the other hand, Ribeiro addresses timed constraints and timeless constraints, as well as propagation and simplification rules, discussed in further detail below (see p. 4, and Figure 3). In relevant part, Ribeiro provides rules for handling timed constraints (timed equality constraints, specifically) and timeless constraints (timeless equality constraints, specifically) (see p. 4, the ¶ beginning with “Although the rules ...” and Figure 4). Ribeiro explicitly provides a first group of rules “composed of simplification rules describing redundancies and conflicts between timed equality constraints and other constraints,” and a second group of rules that “consists of propagation rules describing the transitivity properties between timed equality constraints and other constraints” (see p. 4, the ¶ beginning with “Although the rules ...”; emphasis added). Consequently, Ribeiro does not address resolving constraint conflicts within a constraint type (i.e., intra-constraint), much less simplifying based on a redundancy or a transitivity within the constraint type.

With regard to the removing redundant constraints, Applicants note that Ribeiro teaches away from this feature. Specifically, Ribeiro provides a constraint handling rule (CHR) language for writing user-defined constraint systems, the CHR language consisting of guarded rules. The CHR rules include simplification rules and propagation rules (see p. 2, first ¶ of “2 Constraint Handling Rules”). Each CHR rule includes a head, a guard and a body (see p. 2, second ¶ of “2 Constraint Handling Rules,” and Figure 1).

In relevant part, Ribeiro explicitly provides that the “[p]ropagation rules add new redundant constraints that may be necessary to do simplifications” (see p. 2, first ¶ of “2 Constraint Handling Rules”; emphasis added). Accordingly, not only does Ribeiro explicitly add new redundant constraints, Ribeiro adds new redundant constraints that may be necessary for simplifying constraints. As further provided in Ribeiro, “[a] propagation rule adds the constraints in the body but keeps the constraints in the head” (see p. 2, third ¶ of “2 Constraint Handling Rules”; emphasis added). Accordingly, Ribeiro explicitly provides that new redundant constraints are added, while keeping the originally provided constraints. Consequently, Ribeiro explicitly teaches away from the feature of removing redundant constraints.

In view of the foregoing, Sadiq and Ribeiro fail to disclose or render obvious each and every feature of claims 15, 31 and 41, and Ribeiro explicitly teaches away from removing

redundant constraints. Therefore, reconsideration and withdrawal of the rejection are respectfully requested.

Each of claims 16, 17, 20, 21, 25, 26, 32-34, 36, 37, 39-40, 42-45, 47-49, 51 and 53 ultimately depends from one of claims 15, 31 and 41, which define over the asserted references, as discussed in detail above. Consequently, each of claims 16, 17, 20, 21, 25, 26, 32-34, 36, 37, 39-40, 42-45, 47-49, 51 and 53 also defines over the asserted references for at least the same reasons. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

Claims 50, 52 and 54 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sadiq in view of Ribeiro further in view of "On Building Workflow Models for Flexible Processes," to Mangan and Sadiqu ("Mangan").

Each of claims 50, 52 and 54 ultimately depends from one of claims 15, 31 and 41, which define over the asserted references, as discussed in detail above. Consequently, each of claims 50, 52 and 54 also defines over the asserted references for at least the same reasons. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

### CONCLUSION

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reason for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to amendment. Applicants respectfully request consideration of any filed IDS not previously considered, by initialing and returning each Form 1449.

The undersigned attorney welcomes the opportunity to further discuss by telephone any position or issue not fully addressed by the above remarks and amendments.

No charges are believed due. However, if any fees are due, they are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply all charges or credits to Deposit Account No. 06-1050, referencing Attorney Docket No. 13909-0115001.

Respectfully submitted,

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